

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Donald Jacob Burrs, Jr.
a/k/a Donald Jacob Burrs

Debtor 1

Joyce Melinda Burrs

Debtor 2

M&T Bank

Movant(s)

v.

Donald Jacob Burrs, Jr.

a/k/a Donald Jacob Burrs

Joyce Melinda Burrs

Respondent(s)

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:22-BK-02516-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 39

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Donald Jacob Burrs, Jr. and Joyce Melinda Burrs, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Upon information and belief, the averment as stated in Paragraph 5 is admitted.
6. Upon information and belief, the averment as stated in Paragraph 6 is admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

7. Upon information and belief, the averment as stated in Paragraph 7 is admitted. By way of further response Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

8. Paragraph 8 contains a conclusion of law to which no response is required.
9. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 9; therefore, they are denied.

10. Paragraph 10 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: May 23, 2023

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Camp Hill, PA 17011
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, May 23, 2023, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Brian Nicholas, Esquire
KML Law Group, PC
701 Market Street, Suite 5000
Philadelphia, PA 19106
Counsel for Movant(s)

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire